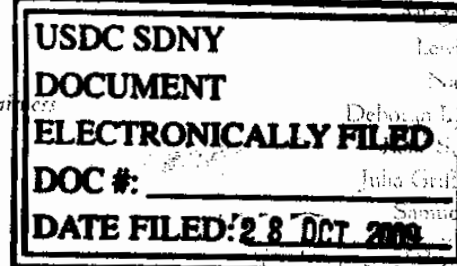


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Advocate for Workplace Fairness



October 26, 2009

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 Melissa Pierre-Louis
 Lauren Schwartzreich

By Facsimile

The Honorable Paul A. Crotty
 United States District Court for the Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: *Masson et al. v. Ecolab, Inc.*, 04 Civ. 4488 (PAC)
Clark et al. v. Ecolab, Inc., 07 Civ. 8623 (PAC)

Dear Judge Crotty:

We represent Plaintiffs in the above-referenced cases. Plaintiffs' plan to file their Motion for Preliminary Approval of Class Settlement, Provisional Certification of the Settlement Class, Appointment of Plaintiffs' Counsel as Class Counsel, Approval of Plaintiffs' Proposed Notice of Settlement, and Other Relief ("Plaintiffs' Motion") on or before November 11, 2009, in advance of the preliminary approval hearing scheduled for November 17, 2009. We respectfully request permission to file a brief of up to 40 pages in support of Plaintiffs' Motion. Defendant's counsel has consented to this request.

We believe that a page extension is necessary to set forth the procedural history of the three cases involved in this litigation and to explain fully the terms of the settlement agreement, which includes an allocation formula that provides class members with different levels of compensation based upon their job title, dates of employment, and state of employment.

Respectfully submitted,

Justin M. Swartz

cc: Shirley Lerner, Esq. (by facsimile and email)
 Andrew Voss, Esq. (by facsimile and email)
 Jeffrey Brecher, Esq. (by facsimile and email)
 Michael Sweeney, Esq. (by facsimile and email)

SO ORDERED: 28 OCT 2009

 HON. PAULA A. CROTTY
 UNITED STATES DISTRICT JUDGE

MEMO ENDORSED